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Fred Dacimo
Site Vice President
Administration

~~Security-Related Information - Withhold Under 10 CFR 2.390~~

February 9, 2006

Indian Point Units 2 and 3
Docket Nos. 50-247, and 50-286
NL-06-022

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

SUBJECT: Response to NRC Phase 2 Assessment of Spent Fuel Pools

- REFERENCES:
1. Letter, C. Haney to M. Kansler, "NRC Phase 2 Assessment of Spent Fuel Pools," December 13, 2005.
 2. Letter, C. Haney to Holders of Operating Licenses, "NRC Phase 2 Assessment: Industry-Wide Summary of Strategies for Maintaining Spent Fuel Pool Cooling," December 16, 2005
 3. Letter, M. Fertel to L. Reyes, "Industry Proposal for Closure Process for B.5.b Phase 2," January 24, 2006.

Dear Sir:

Indian Point Energy Center (IPEC) hereby submits its response to the NRC Phase 2 Assessment (Reference 1). The report identified a number of candidate enhancement strategies for mitigating damage conditions to the spent fuel pools that may result from beyond design basis terrorist threats. The letter requested that IPEC consider the strategies identified and provide a response 60 days subsequent to the date of the industry-wide summary (Reference 2). The industry-wide summary was dated December 16, 2005. The letter (Reference 1) further requested that IPEC provide the results of our feasibility evaluation and our identification of any implementation concerns regarding each strategy. Also, NRC requested that IPEC indicate which of the strategies in this report have been implemented and our plans and schedules for those strategies not yet implemented. The letter further asked that IPEC provide the basis for not implementing an identified strategy.

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In December 2005, the industry convened a Chief Nuclear Officer (CNO) Review Panel to review the results of the industry and NRC spent fuel pool studies and determine the most effective and efficient measures to take to mitigate spent fuel pool damage conditions. The CNO Review Panel recommended a combination internal and external strategy that provides the needed flexibility for responding to events with uncertain outcomes. Their recommendation was endorsed by the industry on January 11, 2006.

IPEC commits to implement the industry strategy described in the NEI letter (Reference 3) to Mr. Luis Reyes dated January 24, 2006 and considers this commitment to fully satisfy the NRC Phase 2 letter request referenced above. IPEC considers the integrated internal and external strategy described in Reference 3 to be a more effective and more efficient means of mitigating potential spent fuel pool damage states than the spectrum of changes proposed in Reference 1.

IPEC is evaluating the range of measures available for accomplishing the internal and external strategies identified in Reference 3. IPEC will provide NRC with a description of our strategies and the plans and schedules for having these strategies in place, including procedures or guidelines and associated training, within 60 days of NRC approval of the industry proposed approach (see Reference 3). A listing of remaining candidate enhancement strategies for water makeup capability identified in Reference 1 that do not require modifications to the facility and are not adopted by IPEC as part of its internal or external strategies will be appended to IPEC's implementing procedures or guidance as further strategies for consideration by response personnel if conditions warrant. However, IPEC is not committing to develop implementing procedures or to conduct training on these additional enhancements.

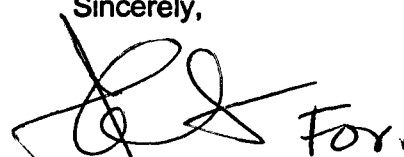
Consistent with Table 2 in the attachment to the NEI letter (See Reference 3), any evident, readily available measures employed, for the internal strategy of providing at least 500 gpm makeup to the spent fuel pool, will constitute non-voluntary obligations to comply with Interim Compensatory Measure (ICM) B.5.b. Any non-evident or beyond readily available measures employed will be considered as voluntary regulatory commitments that become part of IPEC's licensing basis. We will notify you in writing at least 30 days prior to changing any voluntary commitments that reduce our spent fuel pool mitigation capabilities below the level described in Reference 3. Additionally, we will notify you verbally within 30 days of any unplanned reduction in capability to meet the external strategy described in reference 3, unless the condition is corrected within the 30 day period.

Because this response contains security related information, Indian Point Energy Center requests that this letter be withheld from public disclosure in accordance with 10 CFR 2.390.

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Attachment 1 contains the commitments made in this letter. If you have any questions, or require additional information, please contact Mr. Patric W. Conroy, Manager, Licensing at (914) 736-6668.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fred R. Dacimo', with a large, stylized flourish extending to the left.

Fred R. Dacimo
Site Vice President
Indian Point Energy Center

**Attachment 1 - Commitments in Response to NRC Report on B.5.b Phase 2
Assessment of Indian Point Spent Fuel Pools**

cc:

Mr. Samuel J. Collins, Regional Administrator, Region I
Mr. John Boska, NRR Senior Project Manager
IPEC NRC Resident Inspector's Office

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Attachment 1 to NL-06-022

Commitments in Response to NRC Report on B.5.b Phase 2
Assessment of Indian Point Spent Fuel Pools

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 2 AND 3 NUCLEAR POWER PLANTS
DOCKET NOS. 50-247 AND 50-286
DPR-26 AND 64

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List of Regulatory Commitments

The following table identifies those actions committed to by Entergy Nuclear Operations, Inc. in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

No.	Commitment	Action / Date
NL-06-022-1 One time action	Indian Point Energy Center commits to implement the industry strategy described in the NEI letter M. Fertel to L. Reyes, "Industry Proposal for Closure Process for B.5.b Phase 2," January 24, 2006. We will provide you with a description of our final strategies and our plans and schedules for having these strategies in place, including procedures / guidelines and associated training, within 60 days of NRC approval of the industry proposed approach.	To be determined
NL-06-022-2 Continuing compliance	Any non-evident or beyond readily available measures employed will be considered as voluntary regulatory commitments that become part of IPEC licensing basis. IPEC will notify NRC in writing at least 30 days prior to changing any voluntary commitments that reduce our spent fuel pool mitigation capabilities below the level described in Letter, M. Fertel to L. Reyes, "Industry Proposal for Closure Process for B.5.b Phase 2," January 24, 2006.	As required
NL-06-022-3 Continuing compliance	IPEC will verbally notify NRC within 30 days of any unplanned reduction in capability to meet the external strategy described in Letter, M. Fertel to L. Reyes, "Industry Proposal for Closure Process for B.5.b Phase 2," January 24, 2006, unless the condition is corrected within the 30 day period.	As required